

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY, et al.

Defendants.

Case No. 22-cv-02435 (LLS)(SN)

**SUPPLEMENTAL DECLARATION  
OF LYNNE FREEMAN IN SUPPORT  
OF HER MOTION FOR  
RECONSIDERATION OF THE  
COURT'S JUNE 14, 2023 ORDER**

**DECLARATION OF LYNNE FREEMAN**

I, Lynne Freeman, do hereby declare as follows:

1. I am the plaintiff in the above-captioned matter. I write this supplemental declaration in support of the motion for reconsideration filed on my behalf regarding the court's order of June 14, 2023. If called as a witness, I could and would competently testify as follows of my personal knowledge:

1. I was diagnosed with panic disorder approximately 18 years ago after suffering significant trauma. This is why I wrote a book about a girl who comes to Alaska after suffering trauma and has panic attacks as a result of that trauma.
2. There are times when I can fly by taking medication; however, there are years at a time that I can't because the anxiety is too great. This happens during periods of intense life stress. I've gone years at a time unable to fly. Attached to this declaration as Exhibits "1" and "2" respectively are letters from my primary care doctor, Kristi Harter, and my psychiatrist, Michael Manz, which confirm and explain my panic disorder disability.
3. During his deposition, my husband stated that there was a time when I was flying back and forth between California and Alaska. It is true that I did that several years ago. Just as it is also true that I went 5 years without flying, and I have not been on a plane these past 2.5 years.
4. This situation of not being able to fly and having panic disorder is debilitating and interferes with my life. My former literary agent, Emily Kim, knows this. We discussed it at length as I wrote my book about a girl who comes to Alaska after suffering trauma and has panic attacks (the same issue for Ms. Wolff's heroine in her book stemming from the same trauma as mine—loss of family). Ms. Kim met my service dog when I came to the Romance Writers of America conference. We discussed my panic attacks-- the sensations of having one, how they are triggered, how debilitating they are, strategies used to get through an attack, and so on for the heroine of my story.

5. My declaration to this Court last month also advised this Court that my family made the very difficult financial decision to sell our family home in Alaska in order to pay for this case. After living in various rental homes for three years we bought a house in the neighborhood where I grew up and where our son was born. It was a 5-minute walk to school for him, just as it had been for me, and my parents who also went to West High School in Alaska when they were young. But we needed the money to pay for e-discovery, local counsel in New York, expert witnesses, travel costs for our attorneys, depositions, and so on. Thus far, this case has cost us approximately \$580,000 and there is a limit to how much more expense we can bear. If this case is bifurcated, I'm concerned we will run out of money.

I declare under penalty of perjury that the foregoing is true and correct,

Executed July 18, 2023 at Santa Barbara, CA

A handwritten signature in black ink, appearing to read "Lynne Freeman", written over a horizontal line.

Lynne Freeman  
Declarant